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**SINCE 1986**

Received & Inspected

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CLOUD SERVICES ♦ APPLICATION HOSTING ♦ DISASTER RECOVERY PLANNING ♦ HOSTED PBX ♦ SIP TRUNKING ♦ DATA CENTER SERVICES

FCC Mail Room

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

1. Date filed: February 18, 2014
2. Name of company(s) covered by this certification: TLS.NET, Inc.
3. Form 499 Filer ID: 826083
4. Name of signatory: Mark Sperka
5. Title of signatory: Controller
6. Certification:

I, Mark Sperka, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules. See Attached Statement.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:

No. of Copies rec'd 0+4  
List ABCDE

*Let TLS.NET take care of it*



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## TLS.NET, Inc. Statement of CPNI Compliance

### Purpose:

TLS.NET, Inc. records only such Customer information is necessary to adequately, clearly, and correctly invoice clients for services which have been duly authorized and provided, and to monitor and ensure that packet transmission standards meet telephony quality requirements of the client end-users.

### Policy:

In serving clients within the fields of medicine, banking & finance, and education as well as those within the SMB commercial market, the processes and standards of TLS.NET, Inc. have been reviewed by clients within industries whose concerns for network privacy, security, and reliability are more stringent than most. With the advent of each client's due diligence audit, TLS.NET, Inc. has the opportunity to measure itself in those critical areas.

In the process of providing client-requested products and services, TLS.NET collects and uses information about the services being delivered. During that process we may collect non-public information from clients resulting from their completion of applications, contracts, or the use of the service itself. We prohibit the disclosure of any non-public information to anyone other than the client or the client's designated agent or authorized employee.

We restrict access to non-public information to TLS.NET employees whose job requires the access in order to provide the services which have been requested. We maintain physical, electronic, and procedural safeguards to ensure the integrity of all data within our control.

### Procedures:

Packet transmission data is captured for quality review and purged upon completion of the test sampling.

Traffic detail for billing purposes is converted to electronically deliverable Portable Document Format (PDF) files for delivery to the client to and/or retrieval by the end-user client.

The delivery of data in PDF file ensures that only employees of TLS.NET with appropriate login credentials have access to digital network data from which the PDF is drawn.

Traffic data on the TLS.NET network is protected within Cisco routing devices (QoS enabled) located behind tandem Cisco firewalls.

Stored Data is accessible only within 168-bit triple DES encryption.

Data is purged as it reaches the age of 90 days unless a prior written request has been received from an agency of law enforcement or an entity possessing the legal authority to make such a request.

*Let TLS.NET take care of it*